

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON DIVISION**

IN RE: ETHICON, INC. PELVIC REPAIR  
SYSTEMS PRODUCTS LIABILITY  
LITIGATION

Master File No. 2:12-MD-02327  
MDL 2327

This document applies to:

ETHICON WAVE 9 CASES LISTED IN  
PLAINTIFFS' NOTICE OF ADOPTION AT  
EXHIBIT A (Doc. 8274)<sup>1</sup>

JOSEPH R. GOODWIN  
U.S. DISTRICT JUDGE

**ETHICON DEFENDANTS' NOTICE OF ADOPTION OF WAVE 3 *DAUBERT*  
RESPONSE REGARDING SALIL KHANDWALA, M.D.,  
FOR WAVE 9**

Plaintiffs filed a Notice of Adoption as to the opinion testimony of Salil Khandwala, M.D., in the Wave 9 cases identified in Exhibit A to their Notice. *See* Doc. 8274. In response, Defendants hereby adopt and incorporate by reference the *Daubert* response filed in relation to the general causation opinions of Salil Khandwala, M.D. for Ethicon Wave 3 (Doc. 2925) as their response for Wave 9. Defendants respectfully request that the Court deny Plaintiffs' motion for the reasons expressed in the Wave 3 response briefing.

Respectfully submitted,

/s/ William M. Gage  
William M. Gage (MS Bar No. 8691)  
Butler Snow LLP  
1020 Highland Colony Parkway  
Suite 1400 (39157)  
P.O. Box 6010  
Ridgeland, MS 39158-6010  
(601) 985-4561  
[william.gage@butlersnow.com](mailto:wiliam.gage@butlersnow.com)

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<sup>1</sup> Plaintiffs' Exhibit A listed *Elaine Lawson* (2:13-cv-23274), *Lori Ransom* (2:13-cv-18285), and *Kay and Robert Zariski* (2:14-cv-26753). The *Lawson* case is closed and was terminated by the Court on May 9, 2019. The *Zariski* case is also closed and was terminated by the Court on May 9, 2019.

/s/ Susan M. Robinson

Susan M. Robinson (W. Va. Bar No. 5169)  
Thomas Combs & Spann PLLC  
300 Summers Street  
Suite 1380 (25301)  
P.O. Box 3824  
Charleston, WV 24338  
(304) 414-1800  
[srobinson@tcspllc.com](mailto:srobinson@tcspllc.com)

Counsel for Defendants

**CERTIFICATE OF SERVICE**

I certify that on this day, I electronically filed this document with the clerk of the court using the CM/ECF system, which will send notification of this filing to CM/ECF participants registered to receive service in this MDL.

/s/ William M. Gage

William M. Gage